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**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON**

Louis R. D. Ervin and Virginia K. Palmer

Plaintiff(s)

vs.

Porus Adi Irani, Shegufa Adi Haubrich.
a.k.a. Shegufa Adi Irani, Justin T. H.
Haubrich, Himanshu Dasondi, Treaty Adi
Irani, John Haubrich, Boman Rustom Irani,
Managing Director of Rustomjee Group
and Rustomjee Builders, Keystone Group
(the business)

Defendant(s)

Case # **C13-1373**^{RSM}
(To be assigned by the Clerk's Office)

CIVIL COMPLAINT

JURY TRIAL DEMANDED



13-CV-01373-CMP

Parties to this complaint

Plaintiff(s) Name, Address, and Phone Number

1. **Louis R. D. Ervin**, 4016 Letitia Ave S., Seattle, Washington 98118, (206)913-8194
2. **Virginia K. Palmer**, 4016 Letitia Ave s., Seattle, Washington 98118

Defendant(s) Name, Address, and Phone Number

1. **Porus Adi Irani**, 7223 Baird Ave Apt. 111, Reseda, California, 91335

1 -CIVIL COMPLAINT

Louis R. D. Ervin
4016 Letitia Ave S.
Seattle, Washington
98118
(206)913-8194

2. Shegufa Adi Haubrich. a.k.a. Shegufa Adi Irani, Ladhani House, Flat # 7, Proffessor Almieda Road, Bandra (W), Mumbai, Maharastra India, 400050, 9122-26424849

3. Justin T. H. Haubrich, 2709 Moulton Drive, Oklahoma City, Oklahoma, 73127

4. Himanshu Dasondi, Row House No. 4, Diamond Palace, Sector 8, Airoli, New Mumbai, Maharashtra, India

5. Treaty Adi Irani, , Ladhani House, Flat # 7, Proffessor Almieda Road, Bandra (W), Mumbai, Maharastra India, 400050, 9122-26424849

6. John Haubrich, 2709 Moulton Drive, Oklahoma City, Oklahoma, 73127

7. Boman Rustom Irani, Managing Director of Rustomjee Group, 702 Katraj, M.V. Road Junction, Western Express Highway, Andheri (E) Mumbai, Maharashtra, India, 400069

8. Rustomjee Builders, Keystone Group, 702 Katraj, M.V. Road Junction, Western Express Highway Andheri (E), Mumbai, Maharashtra, India, 400069

Jurisdiction

(Reason your case is filed in federal court)

Lanham(Trademark) Act 15 USC 1125 et seq., Copyright Act 17 USC 501 et seq., Extortion and Threats 18 USC 41, Conspiracy Against Rights 18 USC 241, Hate crime acts 18 USC § 249, Blackmail 18 USC 873, Mailing Threatening Communications 18 USC 876, Receiving the Proceeds of Extortion 18 USC 880, Conspiracy to kill, kidnap, maim, or injure persons or damage property in a foreign country 18 USC § 956, Fraud and False Statements 18 USC 1028, 1028(A), Hostage taking 18 USC § 1203, Frauds and swindles 18 USC § 1341 , Wire Fraud 18 USC 1343, Honest Services Fraud 18 USC 1346, Attempt and Conspiracy Mail Fraud and other Fraud Offences 18 USC 1349, Retaliating against Victim 18 USC 1513, Peonage: Obstructing Enforcement 18 USC 1581, Forced Labor 18 USC 1589, Diversity of Citizenship Amount in Controversy 28 USC 1332, Equal rights under the law 42 USC 1981, Conspiracy to Interfere with Civil Rights 42 USC 1985. 42 USC § 1988 - Proceedings in vindication of civil rights 42 USC § 1989 - United States magistrate judges; appointment of persons to execute warrants

Statement of Claim

FALSE REPRESENTATION COMPLAINT FOR INTENT TO DEFRAUD BY EXTORTION AND CONSPIRACY. BREACH OF CONTRACT. NEGLIGENT AND INTENTIONAL DISREGARD FOR SAFTY OF U.S. NATIONALS IN INDIA FOR PERSONAL GAIN. FELONY IDENTITY THEFT. THEFT OF WAGE. FORCED SERVITUDE AND PEONAGE. SLANDER AND LIBEL. RELIGIOUS DISCRIMINATION.

2 -CIVIL COMPLAINT

Louis R. D. Ervin
4016 Letitia Ave S.
Seattle, Washington
98118
(206)913-8194

1 In 2003 my family and I went to India to help my mother and father in law with their needs and
2 their property in India. I was told by both defendant S. Irani and P. Irani that this was supposed
3 to be a two year trip. As soon as we arrived there, my wife took my passport and we were
4 thrown into the running of my father in law's restaurant. For about the first six months we
5 were both on call at all hours, after that Defendant S. Irani, my wife, worked the day shift and I,
6 complainant Louis Robert Dean Ervin, worked the night shift. When we took over this property
7 it was in debt, approximately 24 thousand dollars. It is now worth approximately 4 to 5 million
8 dollars. In addition to my night shift, I was taking care of my children and my father-in-law.
9 From the time that I arrived in 2003 until his death in 2006 I was the primary caregiver for Mr.
10 Adi K. Irani. I got him out of bed in the morning, bathed him, dressed him, including changing
11 his diapers. I was on call throughout the day to get him to the bathroom. I was the one who put
12 him to bed at night. For this, after Adi's death, I received a thank you e-mail, from defendant P.
13 Irani, which reads:

14 "Hi, Thanks. Thanks for the care, love you have provided to my father.

15 Regards, Porus". See Exhibit A, Page 1.

16 I was never paid for any of the work that I did for years.

17 Before his death, my father in law, Adi K. Irani, gifted his property to my wife. In 2005 we
18 arranged a conducting agreement and although this meant that the daily responsibilities of
19 running the operation were now taken care of, we were still responsible for maintaining all of
20 the licenses, dealing with disputes between the conductor and the neighbors, maintenance of
21 the building etc. For a complete list of tasks related to this enterprise, after the conducting
22 agreement was established. See Exhibit B, Pages 4-6.

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS. EXTORTION AND THREATS 18 USC 41, BLACKMAIL 18 USC 873, RECEIVING THE PROCEEDS OF EXTORTION 18 USC 880.

In 2009 after my wife and I worked, for six years, to stabilize and make this property profitable the defendant P. Irani, my brother in law, came to India, from his home in California. He threatened to tie up our only family income in court if my wife did not sign an agreement giving him 70% of the property and the income from that restaurant. That income amounts to about \$2,500.00 per month. In the perjury riddled documents he had drawn up, it is stipulated that if anything happens to my wife, then ownership of the property and all of the profits go to him. The children are cut out until his death. Defendant P. Irani also appointed my wife, defendant S. Irani, his power of attorney obliging her, which always meant us, to do all of the work we had been doing in the first place. If we had not been successful and had failed to secure this business and make it profitable, I guarantee that defendant P. Irani would not have assumed 70% of our debt. See Exhibit B, Pages 2-7

This was a property grab, resulting from the fact that the property became valuable and all of the defendants attempts to get his father to give him the property, before his death, had failed. Just before our arrival in India, and for several years prior, defendant P. Irani had attempted to convince his father to give him his property. He had been denied.

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS. MALPRACTICE, SLANDER, INTIMIDATION. HOSTAGE TAKING 18 USC § 1203, ATTEMPT AND CONSPIRACY MAIL FRAUD AND OTHER FRAUD OFFENCES 18 USC 1349, RETALIATING AGAINST VICTIM 18 USC 1513.

In June of 2010 I was here in Seattle to see my family. I consulted with attorney Bradley Marshall, who wrote a letter to defendant P. Irani, on my behalf and on behalf of my family. See Exhibit C, Page 8. When that letter was received, my wife, Defendant S. Irani, told me that

1 she would never go against her brother, defendant P. Irani. Defendant P. Irani told the attorney
2 a litany of lies in his defense, including, that I had never managed the restaurant, that I had
3 nothing to do with stabilizing the restaurant or making it profitable, that I had never helped
4 arrange the conducting agreement, that my wife wanted a divorce and that I had been abusive
5 etc.

6 Our responsibilities, with regard to the restaurant, included, but were not limited to; ordering
7 inventory of both food and liquor, attending family meetings which included extended family
8 members, keeping books and maintaining records of food, liquor, inventory and employees,
9 filing taxes, dealing with Bombay Municipal Corporation for renewal of about 15 different
10 licenses mandatory for the running of the restaurant, dealing with the excise department for
11 renewal of the liquor license, constantly paying bribes, paying past-due bills, many of which
12 were as old as 5 to 6 months, hiring and firing of employees, working in the kitchen, hosting
13 and waiting tables. For the first six months we were both constantly at the restaurant. After
14 that, I managed the night shift. The employees new me very well and called me Robert Sir. We
15 were constantly busy. We were constantly asked for bribes. We were trying to find someone
16 to run the restaurant on lease. There were always people with business proposals coming in,
17 etc, etc. If both my wife and I had not had restaurant management experience we would have
18 failed. The striking thing about all of the work I have done for this family is that, at no time, was
19 I paid any wage. To see the office letter head and other proof of my work in India. See exhibit
20 D Pages 9-13.

21 The date of Mr. Marshall's letter was June 9, 2010. On June 13, 2010, while I was still in Seattle,

1 my wife sent me an e-mail instructing me to go to Denver Colorado, buy a condo and stay
2 there. In this e-mail she says:

3 "If you are sure that I have credit line active for \$22,000.00, you can visit the places and
4 check the neighborhood and put some offers there. We will manage the court and other
5 problems. You can keep the condo ready and stay there."

6 I e-mailed back on June 15, 2010:

7 "What do you mean that we can work out the court thing. Are you able to come back"

8 See Exhibit E, Page 14

9 It had been my understanding that I would return to India, we would settle a pending lawsuit,
10 and then we would return to the U.S. Now I was in Seattle and I needed to help my family, so I
11 refused to go to go to Denver. We knew no one in Denver, defendant Dasondi, our lawyer, had
12 contacts there. Mr. Dasondi planned to leave his family in India and come to Denver to practice
13 law with my wife. His contacts made Denver their chosen destination. I had no idea what kind
14 of setup this was.

15 Defendant Himanshu Dasondi, who had been paid a monthly fee to work for us on other cases,
16 began advocating for my wife and her brother. He began telling me, over the phone, that my
17 wife was not going to come to Seattle upon our return to the U.S. He was very stern and
18 instructive and he began accusing me of abandoning my family. He then brought up divorce by
19 mutual consent. When I told him that I did not want a divorce, that I was not abandoning
20 anyone, but that I did not intend to go to Denver, he said that defendants S. Irani and P. Irani
21 were talking about filing a Guardianship Petition. (It is important to note here that after

1 defendant Dasondi had been working for my wife and I for approximately four years, defendant
2 P. Irani, hired him as well.)

3 On June 29, 2010 I received an e-mail from my wife, defendant S. Irani, stating that:

4 "...robert , i understand you have got my message of divorce by mutual consent which means
5 you give me my freedom and kids their freedom away from all these law suits you are filing and
6 get to worry about the future of our kids and you get the freedom of filing any law suit against
7 anyone,"... See Exhibit F, Page 15.

8 **WILLFULL AND INTENTIONAL INTERFERENCE WITH CHILD CUSTODY, INTENTIONAL**
9 **INTERFERENCE WITH PARENTAL RELATIONS. INTENTIONAL INTERFERENCE WITH MARITAL**
10 **RELATIONS. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS. HOSTAGE TAKING 18 USC**
11 **1208, MAIL FRAUD; FRAUDS AND SWINDELS 18 USC 1341, FRAUD BY WIRE, RADIO OR**
12 **TELEVISION 18 USC 1343, RETALIATING AGAINST VICTIM 18 USC 1513, PEONAGE:**
13 **OBSTRUCTING ENFORCEMENT 18 USC 1581, FORCED LABOR 18 USC 1589, DIVERSITY OF**
14 **CITIZENSHIP AMOUNT IN CONTROVERSY 28 USC 1332, EQUAL RIGHTS UNDER THE LAW 42**
15 **USC 1981, CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS 42 USC 1985.**

16 My children were used to lure me to India. The Defendant, Mr. Porus Irani, has always related
17 to me as if he was the head of my family. In an e-mail he once put it this way:

18"So Robert, before you get angry please understand that I have had discussions with
19 my sister that you may not be aware of and when she veers from these discussion, I
20 have to investigate" See Exhibit G4 page 19.

21 Because I do not consider defendant P. Irani the head of my family, he does not want me
22 around. This was made perfectly clear by the manner in which my children were taken to India
in March of 2003. At that time, it was agreed that defendant P. Irani, who was going to India in
March, would take our children with him, that my wife would leave for India in May, after the
closing of the restaurant she was working at here in Seattle, that I would come after the real

1 estate I was under contract to sell, either sold or, the contract to sell it expired, and that
2 defendant P. Irani would pay for the passage of my entire family. Instead of adhering to that
3 agreement, after the rest of my family was abroad, I was evicted from the condominium that
4 we had been renting from defendant P. Irani and I was told that I would not be sent to India.
5 My wife returned to Seattle, without my children, to take me to India. If defendant S. Irani had
6 returned with our children, I would have insisted that we remain in the U.S. But, at the time, I
7 had to get to them.
8 Now I was in Seattle, It was 2010 and I kept saying that I did not want a divorce, but that I didn't
9 want to go to Denver. My wife and Mr. Dasondi kept projecting abandonment on me to
10 pressure me to go to Denver and to drop the legal action against defendant P. Irani. They spoke
11 of abandonment in front of my children and directly to them, moreover they began feigning
12 concern for these children, as they used them as leverage to force me to go to Denver and drop
13 the legal action against my wife's brother, defendant P Irani. They wanted me to go and set
14 things up, I was to fall back in line and to stop the insanity of my dispute with the defendant
15 Porus Irani.
16 For at least four years, prior to my departure from India for the U.S. in 2010, defendant
17 Dasondi and my wife, defendant S Irani, had been spending vast amounts of time together,
18 including, "legal trips", during which, they spent the nights in the same motel room. Defendant
19 Dasondi has also been tutoring my wife, Defendant S. Irani, throughout her years in law school.
20 Defendant Dasondi is not a teacher, but this has allowed them to spend massive amounts of
21 time together, often at a hotel in Mumbai. See Exhibit P, page 88.

1 During this time, I have been at home taking care of the children, often not knowing where my
2 wife was or when she would return home. I had always been the primary care giver for my
3 children. I had been told, by my wife, defendant S. Irani and defendant Dasondi, that they were
4 not involved. However, almost everyone we knew was telling me otherwise. I was accused of
5 paranoia if I voiced concern about the two of them spending so much time together.

6 In an e-mail the defendant P. Irani, my wife's own brother says Quote:

7"I also remember many times you calling to see where Shegufa was for no one could
8 find her or was she where she stated she would be".... See Exhibit G3 page 18.

9 **INJURYOUS FALSEHOODS. MALICIOUS CONSPIRACY TO PROCURE DIVORCE. MALICIOUS**
10 **CONSPIRACY TO EXTORT CHILD CUSTODY. SLANDER AND LIBEL. INTENTIONAL INFLICTION**
11 **OF EMOTIONAL DISTRESS. EXTRA MARITAL AFFAIRS. HONEST SERVICES FRAUD 18 USC 1346,**
12 **PEONAGE OBSTRUCTING ENFORCEMENT 18 USC 1581, EQUAL RIGHTS UNDER THE LAW 42**
13 **USC 1981, CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS 42 USC 1985.**

14 In July 2010, I, Petitioner Louis Robert Dean Ervin, was hit with an order for temporary
15 guardianship of my children by way of the Pune Family Court, in India. I was never even
16 notified of a hearing or any other type of notice before this temporary order was obtained.
17 Service under the Hague Convention was completely violated. My wife, defendant S. Irani,
18 entered the documents, giving 70% of the property and the profits to defendant P. Irani into
19 the Pune family court as an indication of how she had protected the economic interests of the
20 children. She also accused me of extortion for challenging that agreement.

21 This temporary guardianship order was served by e-mail. I have never received any court
22 documents. Defendant S. Irani's petition consists of one lie and one false accusation after
another. I believe that the documents regarding the property were entered into the Puna
Family Court in an attempt to get that court to ratify and endorse them. To my knowledge

1 they have not met any of her demands since receiving my responses. I was sent an e-mail from
2 Mr. Dasondi with this petition, he opens with the line:

3“We are concerned for our client Ms. Shegufa Adi Haubrich a.k.a Shegufa Adi Irani”....

4 Here defendant Dasondi is trying to sound as if he is a partner in some large law firm, when in
5 fact, the “we” referred to here consists of two people, my wife, defendant S. Irani and
6 defendant Dasondi himself. The H D and associates referred to here is actually a law
7 partnership between the two of them, Haubrich (my wife’s a.k.a.) and Dasondi. At this point,
8 defendant Dasondi had been working for my wife and I for Approx. five years. Defendant
9 Dasondi has been paid a monthly fee of Rs. 10,000.00 or aprox. \$200.00 and he has been
10 provided with an office in property obtained during our marriage. Even though he planned to
11 leave his family in India and come to the U.S. to practice law with my wife, he was the one who
12 led the charge of abandonment against me. The fact is I was actually being shut out of my
13 family. Mr. Dasondi had been working for us. See Exhibit H page 21.

14 I felt abandoned and I finally realized that everything people had been telling me about my wife
15 and Mr. Dasondi being involved in an affair was true. I think I went into denial about their affair
16 as a way of surviving my stay in India. I felt terrible for having reassured Mrs. Dasondi that they
17 were not involved when she told me that they were. In fact my wife’s mother, her brother
18 Tempton and her nephew Zareer made this allegation.

19 See Exhibit G3 page 18, Exhibit U pages 125-126, 128 and exhibit V pages 134-135.

20 **CONSPIRACY TO KILL, KIDNAP, MAIM, OR INJURE PERSONS OR DAMAGE PROPERTY IN A**
21 **FOREIGN COUNTRY 18 USC § 956.**

1 As I said, immediately after I arrived in India, in 2003, my passport was taken from me by my
2 wife, and locked away with the others in a locker at my mother in laws home. On several
3 occasions I asked for my passport and was denied. If I objected or insisted, I was threatened
4 with the loss of my children. In 2009, when the passports were being used for renewal of
5 Residence Status, I took an opportunity to make copies of my families passports. I was not
6 entitled to keep my own passport, let alone my children's passports. It was out of the question.
7 Telephone calls from my mother and other family members were blocked; e-mails were
8 blocked and or deleted from my account. E-mails from my mother, in particular, had been
9 blocked. She received failure to deliver messages most of the time. I was strategically isolated
10 from everyone I had ever known in the U.S. When they were in my company, defendant P.
11 Irani, his sister defendant S. Irani, his mother Treaty Irani and our attorney Defendant
12 Himanshu Dasondi often spoke in Hindi, Murathi and Gugarati in front of me, even though we
13 share English as a common language. After my first objections to the 70%-30% deal, I was riding
14 a motorcycle In Pune India, when someone crossing the street with their scooter intentionally
15 thrust their scooter in front of me causing me to crash. While his partner took his scooter
16 across the street, this man lifted me up and said
17 "Come over here, something is better than nothing! Something is better than nothing!"
18 This seemed to me to be in reference to a settlement offer made by defendant Mr. Boman
19 Rustom Irani. I tried to walk away and go pick up my motor cycle and was grabbed by the arm,
20 from behind and turned around. I broke his grip and stood face to face with this man who then
21 left with his friend. When I told my wife, defendant S. Irani and defendant Dasondi about this
22 incident, I was called paranoid.

1 The following e-mail, sent to me on June 12, 2010, shows how my wife and I were relating,
 2 before the letter from Bradley Marshal was received, how defendant Dasondi worked for us
 3 and how much time they were spending together while I was in the U.S.
 4"darling i am so busy with kids in pune and poor himanshu is here to help me drive around
 5 the kids and buy groceries and helps with selling and loans. how much would a bluberry phone
 6 cost. he would really appreciate that . but if you cannot see the price dont worry i just thought
 7 for all the time he spent running around free of charge to delhi and bombay this would make
 8 him apprecite that we have given something for all the work constantly he does for us . even
 9 now he is putting bomans application for bringig up the matter in high court so that sir nirgude
 10 will because he will remember me from previous orders and he will grant a hearing since he will
 11 realize i am still waiting for justice. ".... See Exhibit H1 page 21.

12 After speaking to me on the phone several times and projecting abandonment on me. In an e-
 13 mail dated June 18, 2010 defendant Dasondi says things including:

14 "Yes I am at war with you if it comes to protecting Shegufa (my wife)" and "I remember you
 15 helping my father in repairing his house and I am sorry I cannot do anything for you there (in
 16 U.S.A.)". See Exhibit H2, page 22.

17 Defendant Dasondi was not defending my wife, he was protecting Defendant P. Irani and his
 18 own personal income. I was trying to protect my wife and our children. Moreover defendant
 19 Dasondi encouraged me to sue defendant P. Irani as I left India for the U.S.

20 See Exhibit G2,G3 p.17-18.

21 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS. BLACKMAIL 18 USC 873, HOSTAGE**
 22 **TAKING 18 USC § 1203.**

1 When they started threatening me with divorce and guardianship, I felt as though I was being
 2 blackmailed. I also felt that I have no home to return to in India. I finally had to tell defendant
 3 Dasondi that I was no longer willing to discuss this matter with him. I kept asking my wife,
 4 defendant S. Irani to settle the law suit and come to Seattle. I did speak to my daughter, she
 5 asked me if I was coming back to India, to which I said "No baby I am trying to get you home
 6 from here", and that is the evidence they point to as proof that I abandoned my children. This
 7 was the same call that I tried to get my wife to join the fight against her brother for extortion.

8 **WILLFUL CRIMINAL CONDUCT OF DEFENDANTS CONSPIRING WITH SOLE INTENT TO DAMAGE**
 9 **PLAINTIFFS: PASSING OFF COPYWRITTEN INTELLECTUAL PROPERTY. IDENTITY THEFT. MAIL**
 10 **FRAUD. HATE CRIMES. BREACH OF COVENANT OF GOOD FAITH. INTENTIONAL**
 11 **INTERFERENCE WITH EMPLOYMENT. INTENTIONAL INTERFERENCE WITH PROPERTY RIGHTS.**
 12 **ATTACKS ON OUR EVERY ATTEMPT TO PROMOTE OUR BOOK BEFORE OUR PUBLICATION AND**
 13 **SINCE. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS.**

14 **LANHAM (TRADEMARK) ACT 15 USC 1125(A), COPYRIGHT ACT 17 USC 501 ET SEQ.,**
 15 **EXTORTION AND THREATS 18 USC 41, CONSPIRACY AGAINST RIGHTS 18 USC 241, FRAUD AND**
 16 **FALSE STATEMENTS 18 USC 1028, 1028 (A), ATTEMPT AND CONSPIRACY MAIL FRAUD AND**
 17 **OTHER FRAUD OFFENCES 18 USC 1349.**

18 On June 20, 2010, days after the letter written on behalf of my family from Bradley Marshal had
 19 been received, a book, written by my mother and I, was published, without our consent, on a
 20 scribed account opened under the pseudonym Zorasthustra. On this website it is said:

21 "take this book and distribute it free of cost, a gift from my mom. Bigot Nonbigot".

22 The account directs visitors to a zorasthustra.org website. This is the website that my stepson,
 defendant J. Haubrich hosted on my server account at InMotion Hosting. We have two
 copyrights on this work with the library of congress, the most recent in 2007.

For over two years anyone searches the title of our book were directed to this site and links to
 defendant Justin Haubrich's web store. He did this before our final edit. Defendan S. Irani, is

1 my estranged wife and the "mom" Justin refers to. She vacillates between wanting to own our
2 book and wanting to slander it. See Exhibit J Page 64.

3 This happened just as we were about to launch our project. We have not been able to promote
4 this book at all because they began to contact business associates etc. Because our book had
5 been published on scribd without our consent, we had to prove to Amazon KDP, the Publisher,
6 that we hold the copyright otherwise they were going to cancel our account. See Exhibit I page
7 23-26, Exhibit J page 57.

8 This was just the beginning of a relentless campaign of internet harassment that includes an
9 imposter facebook page attacking both petitioners, our book and family members. In 2006, my
10 wife signed an affidavit for Mumbai Magistrate Court, swearing that she would not engage in
11 internet harassment against Mr. Boman Irani. At that time the harassment was, allegedly,
12 being done on her behalf by the defendant, P. Irani and his partner Mr. Mathew Passmore.
13 Because that harassment is being continued on the same site that our book is being published,
14 we believe that defendant J. Haubrich is being used to continue the harassment of Mr. Boman
15 Irani and to engage in the harassment of us, our family and our friends.

16 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS. HATE CRIMES: 18 USC § 249**

17 The most recent incident of this harassment, that we are aware of, occurred on May 5, 2012
18 9:23 pm, the following evil and racially charged threat was posted to one of my closest friends.
19 It was signed with my name, Robert Ervin, and had a link to our website, The International
20 Coalition for Non-bigotry. It was allegedly posted by defendant J. Haubrich using an e-mail
21 address from: notifications@webs.com. It Says: "you a black punk-ass bitch nigga, id beat yo
22 ass any day, come fight me you punk. You aint got shit on me". See Exhibit J page 48

1 This was sent to Mark Bryant, an old and dear African American friend, who has been my
 2 martial arts instructor for nearly thirty years. I am of European American, African American and
 3 Native American heritage.

4 I have tracked this e-mail. The International Coalition for Non Bigotry website, upon which our
 5 book is for sale, is set up to track all visitors. According to the clicky report tracking it, our
 6 website had a visitor located in Oklahoma City, OK. They logged in at 6:09:54 pm on May 5,
 7 2012, they visited three pages and then went to signup page. After 5 attempts, at 6:20:50 pm
 8 they created this login: See Exhibit J page 49-51.

9 /apps/auth/thanks?action=signup&name=JimCarrey&email=rdervin%40yahoo.com. Then they
 10 visited our members page and under my profile they found that I was a member of the website
 11 of my very old and dear friend Mark Bryant. His site url address is:

12 www.personaltrainermark.com. Both websites are hosted at www.webs.com. Then the evil,
 13 racist comment was sent in my name.

14 To see other examples of this campaign of internet harassment, including an imposter
 15 Facebook page allegedly posted by defendant J. Haubrich. See Exhibit J pages 27-67.

16 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS. EXTORTION AND THREATS 18 USC 41,**
 17 **RECEIVING THE PROCEEDS OF EXTORTION 18 USC 880, HOSTAGE TAKING 18 USC § 1203.**
INTRODUCED IN PUNA FAMILY COURT AS AN EFFORT TO PROTECT ECONOMIC SECURITY OF
CHILDREN. PERJURY.

18 In defendant S. Irani's complaint she told the Puna Family Court:

19"When during meeting held between the Petitioner, her said brother Porus Irani and mother
 20 Mrs. Treaty Irani it was decided that the said business of M/s Adi Irani's Blue Gardenia
 21 Restaurant Bar and Bakery although gifted to the Petitioner during the lifetime of Late Shri Adi

1 K Irani, be converted into a partnership firm consisting said Mr. Porus Irani and the Petitioner as
 2 partners having 70% and 30% share therein respectively. Accordingly a Deed of Partnership
 3 dated 20th March 2009 was executed between the said brother of Petitioner and Petitioner.
 4 Although, the said business was converted into a partnership firm, the said brother of the
 5 Petitioner has allowed the balance of compensation income derived there from after paying
 6 monthly allowance of Rs. 40,000/- to her mother during her lifetime, to be utilized by the
 7 Petitioner for maintenance and upbringing of the said minors. Furthermore it is provided in
 8 clause 15 of the said Deed of Partnership dated 20th March 2009 that: in case any of the above
 9 partners (i.e. the Petitioner and her said brother Mr. Porus Adi Irani) expires then the said
 10 business shall be run by the other partner and he/she will be running partner of the said
 11 business. That it is further agreed between the partners that after the expiry of both the
 12 partners then their only legal heirs i.e. Malcolm Ervin and Aanahita Ervin (i.e. the said minors)
 13 shall be entitled to said business, which should be shared equally."

14 Presently after deduction of TDS and monthly allowance to the mother, the Petitioner is
 15 allowed to utilize more than Rs. 1,20,000 per month for the maintenance and upbringing of the
 16 said minors. Annexed hereto and marked as Exhibit C is a copy of cheque dated 19th July 2010
 17 issued by the Conductors of the said business for the month of August 2010. Petitioner craves
 18 liberty to refer to and rely upon Conducting Agreement executed with the said Conductors of
 19 the said business and other documents to prove stable income for the maintenance of the said
 20 minors;"....

21 **CRIMINAL ACTS CAUSING WRONGFUL PROSECUTION. INTENTIONAL SPOILATION OF**
 22 **EVIDENCE; PASSPORTS. FALSE STATEMENTS TO FEDERAL AGENCIES REGARDING ABUSE,**
ABANDONMENT AND THEFT OF PASSPORTS. WILLFUL AND INTENTIONAL FALSE

1 **PROSECUTION OF PLAINTIFF ABROAD. WILLFUL AND INTENTIONAL DECEPTION OF THE**
2 **COURTS IN INDIA.**

3 So, for challenging this property grab I was accused of extortion.

4 In my response to the Puna Family Court I said:

5"The documents arranging this partnership are riddled with the same type of perjury being
6 demonstrated throughout this affidavit filed against me. The stable income referred to here in
7 her justification for Guardianship, is based upon whether her brother, Mr. Porus Adi Irani, will
8 continue to allow the Petitioner to receive the monthly income she was fully entitled to prior to
9 this alleged extortion. Now she and the said minors are only entitled to 30%. This agreement
10 has compromised the economic security of both the petitioner and the said minors.

11 Furthermore the Petitioner states that the arrangement was done for the benefit of the said
12 minors to secure their future. In fact she has compromised their future as well as their present
13 economic security. This just gives Mr. Porus Adi Irani leverage to manipulate, dominate, dictate
14 and penalize the Petitioner (in this case defendant S. Irani.) if she does not do what he wants
15 her to do, say what he wants her to say, go where he wants her to go, etc. etc. etc. What
16 responsible parent would either agree to this or endorse this agreement? Defendant P. Irani,
17 stayed out until this property was profitable and secured. He was working in the U.S. while we
18 incurred all the risk and did all the work. The striking thing about all of the work I have done for
19 this family is, that at no time, was I paid any wage. The Petitioner has listed her accounting of
20 the money I have been allowed to have over the last seven years and it is almost comically
21 meager. Moreover, I am being portrayed as someone that has not done the work at all. I am
22

1 now cast as a no good, violent, dangerous, lazy bum, with a crazy violent mother, and the
 2 marriage between the Petitioner and myself is portrayed as terrible". See Exhibit K pages 68-70.

3 **PERJURY, DOMINATION, EXTORTION: CONSPIRACY AGAINST RIGHTS 18 USC 241, RECEIVING**
 4 **THE PROCEEDS OF EXTORTION 18 USC 880.**

5 In the legal document, appointing my wife, defendant S. Irani, P. Irani's power of attorney, he
 6 claims to be an Indian inhabitant residing at: 7 Ladhani House Proffesor Almieda Road, Bandra
 7 (W) Mumbai 400050.

8 He claims to travel a lot to do business that he is unable to attend to said matters and do
 9 various deeds etc. and he is therefore desirous to appoint defendant S. Irani, who he claims is
 10 then presently residing with him at the aforesaid address, as his power of attorney. Defendant

11 S. Irani, lived with me at our address at the time this document was made official at: 18 Royal
 12 Vista, Palace Orchard, Undri, Pune, 400048

13 In fact defendant P. Irani resides and works full time in west hills California, in the United States
 14 of America. He has a home there and has been working for Quest Diagnostics. He has worked
 15 in the U.S. For Quest Diagnostic for the last 25 years since the company was known as Smith
 16 Kline. I have known of property owned by defendant P. Irani in Seattle WA, Oklahoma City, and
 17 I believe that he owns property in California as well.

18 Though she claims Ladhani House (Her Mother's Residence) as her secondary residence
 19 defendant S. Irani resided and finished her law degree from ILS College in Puna. She lived with
 20 me for 14 years prior to my departure for the U. S. from India in 2010.

21 **REGARDING MALPRACTICE: HONEST SERVICES FRAUD 18 USC 1346, RETALIATING AGAINST**
 22 **VICTIM 18 USC 1513, PEONAGE OBSTRUCTING ENFORCEMENT 18 USC 1581, FORCED LABOR**
18 USC 1589, DIVERSITY OF CITIZENSHIP AMOUNT IN CONTROVERSY 28 USC 1332, EQUAL

1 **RIGHTS UNDER THE LAW 42 USC 1981, CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS 42 USC**
2 **1985.**

3 On October 7, 2010 defendant Dasondi sent me another one of his "legal" notices, making one
4 false accusation after another. At this point defendant Dasondi had been sending me these
5 notices, bullying me and badgering me, since the previous June, so I felt I had to disarm him. I
6 sent him an e-mail requesting the file regarding the Boman Irani law suit, the case in which he
7 and defendant S. Irani had been representing me for the last four years.

8 See Exhibit L page 71.

9 October 15, 2010 defendant Dasondi responded, amazingly, by saying quote:

10"Ms. Haubrich is the complainant and I have been representing her. I have personally
11 represented you only for obtaining leave of court on request of my client and for which I
12 have never been compensated till date".... HD&Associates. See Exhibit M1 Page 74.

13 (this e-mail starts here and finishes as exhibit L page 71.)

14"I may remind you that it is me who have all the time warning you that any stupid
15 action against brother of your wife would spoil your relationship with your wife"

16 See Exhibit M 4 page 72.

17 Defendant Dasondi has represented me in this case from the very beginning and he has been
18 paid a monthly fee by my wife and I to handle this matter. See Exhibit M2, M3 page 72 to 74.

19 On October 31, 2010 I wrote:

20 "It really doesn't matter to me who you say has been working for me. This partnership
21 has represented me. Regarding payment, Mr. Dasondi, you have not only represented
22 me in court but you have been paid by my wife and I on a monthly basis to handle our

1 affairs there in India. You both might want to reconsider just how much malpractice you
2 want to engage in at my expense and at the expense of my children.”

3 See Exhibit M3, page 74.

4 On October 31, 2010 defendant Dasondi writes using HD & Associates Letterhead denying their
5 partnership. See Exhibit M 6, page 73-74.

6 Nov. 4, 2010 defendant Dasondi responded in an e-mail on HD&Associates letterhead:

7 “I may remind you that it is me who have all the time warning you that any stupid action
8 by you against brother of your wife would spoil your relationship with your wife and
9 that you really don't have any case, which turned out to be true. However, in your zeal
10 to wreck vengeance against Porus you ruined your married life for which you have to
11 thank yourself. How can your wife become partner in law firm when she has just passed
12 her law exams on the day when you broke hell on her and has yet to give Bar admission
13 exams”.... See Exhibit M 4 page 72.

14 On Nov 18, 2010 I received yet another e-mail about Denver Colorado from my wife, defendant
15 S. Irani. This is as if to say, if you will go to Denver, all of these problems will go away.

16 See Exhibit M 5 page 75.

17 In an e-mail dated November 21, 2010 defendant Dasondi says among other things:

18 “As is evident from records, our client and your wife Ms. Shegufa Adi Haubrich(a.k.a. S.
19 Irani) is complainant in the other connected matter and she is seized of all papers in
20 both the above matters. Your wife has also executed an acknowledgment confirming
21 that the papers of the above two matters are taken away by her”.... See Exhibit M 7
22 page 80.

1 In an e-mail dated Nov. 25, 2010 Defendant S. Irani speaks as though she is representing
2 herself. Quote:

3"Your wife does not require your authorization, since she is the complainant in the
4 case and you are just a witness, that too you are now a hostile witness"....

5 See Exhibit N2 p. 83-84. (quote on page 84.)

6 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS. HONEST SERVICES FRAUD 18 USC 1346.**

7 Every time my wife, defendant S. Irani and defendant Dasondi presented this case, my head
8 was shown and my Injury was highlighted. How I became only a witness is beyond the pale, but
9 oh so typical of my wife's sense of fair play and justice. I was led to believe that I was a
10 complainant, as an injured party, entitled to damage claims. See Exhibit O, page 86-87.

11 I asked her when I became a hostile witness, and unbelievably, on November 10, 2010
12 defendant S. Irani sent an e-mail which says:

13 "These e-mails are only to make you understand how you have become hostile the rest leave it
14 to me." See Exhibit G 1 p. 16.

15 Amazingly, the e-mails she sent are a June 9, 2007 e-mail exchange between me (plaintiff Louis
16 Ervin) and the defendant P. Irani. In this e-mail I am angry at defendant P. Irani but I am
17 defending my wife, defendant S. Irani from accusations that I now believe to be true. So
18 evidently they all decided to reduce me to a witness in the case long ago. Defendant S. Irani
19 also posted false and sensationalized allegations regarding both cases on my facebook page
20 From June 2010 to June 2011 in retaliation for challenging P. Irani's alleged extortion. For
21 examples: See Exhibits J p.40- 42. Her son, Justin Haubrich has done this to me as well. See
22 Exhibit J p. 54-57 .

1 INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS. INJURYOUS FALSEHOODS. CRIMINAL
 2 ACTS CAUSING WRONGFUL PROSECUTION. WILLFUL AND INTENTIONAL FALSE PROSECUTION
 3 OF PLAINTIFF ABROAD. WILLFUL AND INTENTIONAL DECEPTION OF THE COURTS IN INDIA.
 4 FRAUDS AND SWINDLES 18 USC § 1341, CONSPIRACY TO KILL, KIDNAP, MAIM, OR INJURE
 5 PERSONS OR DAMAGE PROPERTY IN A FOREIGN COUNTRY 18 USC § 956, DIVERSITY OF
 6 CITIZENSHIP AMOUNT IN CONTROVERSY 28 USC 1332, CONSPIRACY TO INTERFERE WITH
 7 CIVIL RIGHTS 42 USC 1985.

8 Regarding the Boman Irani law suit referred to here: In 2006, as the result of one of the Irani
 9 family meetings that I was not allowed to attend. It was decided that my family would accept
 10 an invitation from Mr. Temton Irani's wife, Shiraz Irani, to visit Temton's family estate. Mathew
 11 Passmore, defendant P. Irani's partner, was always allowed to attend these family meetings
 12 where the fate of my children and I was decided. During this family meeting, I later learned,
 13 that defendant P. Irani had suggested that going to the farm was not safe. In spite of the fact
 14 that I was telling the family that we should not go, defendant P. Irani failed to bring up his
 15 reservations before me. Knowing that my wife, defendant S. Irani was going, with or without
 16 my approval, I accompanied my mother in law, my father in law, my wifes oldest brother
 17 Temton and my wife, defendant S. Irani to this family farm. On this occasion, defendant P. Irani
 18 and his partner Mathew Passmore decided to go and enjoy in Goa, on the beach, instead of
 19 coming along with us. Strangely enough, all of the people who, defendant P. Irani sent to the
 20 farm, had some claim to the restaurant. We had gone to Daisar Farm as invited guests. On this
 21 occasion we were accompanying my brother in law, Tempton Irani, on a visit to see his wife on
 22 the day after their wedding anniversary, he wanted to discuss moving back into the house now
 owned by him and his adopted brother, defendant Boman Irani. That night when we were
 getting ready for bed we were suddenly ambushed by a group of 30 men many of them were
 security guards for defendant Boman Irani. Defendant Boman Irani and Tempton Irani were

1 adopted sons of Rustom Irani. It was my understanding that the farm was owned jointly by
2 both adopted brothers. This group that attacked us included defendant Boman Irani's Tae
3 Kwon Do instructor Jagdish, his head of security and some of his board of directors from
4 Rustomjii Builders, Boman's multimillion dollar company. This mob took all our cell phones and
5 all our bags. They immediately assaulted my wife who had tried to take a cell phone back so
6 that she could call for help. They were assaulting Tempton and our driver and they had me
7 surrounded. They dragged us down the stairs of the bungalow and out into the front yard. They
8 bounced Tempton down the stairs carrying him by his arms and his legs. They carried my wife
9 down after him in that same fashion and my mother-in-law and I were escorted down the stairs
10 along with our driver. My father in law could not walk and was left upstairs. Defendant Boman
11 Irani's biological brother Percy began shouting orders to the crowd to strip Tempton of his
12 clothes while the driver and I were restrained in the driveway to the side of the lawn. Percy
13 then shouted orders to this crowd of 25, to strip my wife and have fun with her. I broke free
14 from the men restraining me and stood in front of these men asking them not to assault my
15 wife, who was, at this point laid out on the ground. We were unarmed, I was completely non
16 aggressive, every one of these men were armed with either sticks, pipes or Iron rods and all
17 were crouched down grabbing at her clothes. I stood between them and my wife. I crouched
18 down and pleaded, "please don't do this". At this point the crowd began to back off when my
19 mother-in-law began shouting "He knows karate! He knows karate and he is going to kill you
20 all!" I was restrained again. Now two security guards were restraining my wife. She was
21 fighting them, biting one on the ankle and grabbing the other by the testicles. I could not
22 believe that my mother-in-law and my wife were trying to fight this crowd of men. Under these

1 circumstances they were recklessly compromising our safety. This is when Percy took what my
2 family later described as an iron rod and struck me over the head from behind, while I was
3 restrained. My wife, my brother-in-law Temton and I were then thrown into our vehicle and
4 driven outside the gate. We were about to drive off to try and get some police help when my
5 wife jumped out of the car to save our driver who was being viciously beaten. We were able to
6 save him and get him in the car and the four of us drove to the nearest police station. When we
7 found the police station the first thing we noticed, was a plaque saying that the building had
8 been donated and built by Rustomjii Builders(the company owned by defendant Boman Irani).
9 We spent the next 45 minutes trying to convince the officers that we needed to be escorted
10 back to the property to get my mother-in-law and my father-in-law. Upon our return to the
11 farm we found a big police vehicle and several officers and senior officers at the site of the
12 assault. They refused to take our complaint, saying that if they took our complaint they would
13 have to take the complaints of the people who had assaulted us and that we would all have to
14 be arrested. Even after our attorney Himanshu Dasondi had arrived, the police refused to take a
15 complaint. By then it was about 4 AM and we had to go to the state hospital. I received
16 stitches in the back of my head. That very next morning, my wife and I had to take the bus to
17 the US consul where we reported this incident and I was having trouble focusing my eyesight.
18 See Exhibit O pages 86-87.

19 Since defendant P. Irani thought that it was not safe to go, how could he let his aged mother
20 and father, his brother, his sister and I go to a place where we were viciously attacked. Over
21 the course of the next week we filed a complaint in court, as this was the only way that a record
22 of our assault could be established. Approximately 3 weeks after we filed our complaint, a

1 counter blast case was filed, on behalf of Mr. Boman Irani, by his head of security, charging us
2 with assault with deadly weapons, breaking into the compound and several other very serious
3 charges all of which were false. This is in spite of the facts that the police had stopped by
4 earlier in the day and new that we were guests, that there were no problems and none of
5 defendant Boman Irani's gang had any injuries . Our complaint has always alleged that
6 defendant Boman Irani ordered this attack over the phone. M.H.B. Colony Police said initially
7 and after reinvestigation that Boman was not involved.

8 Defendants S. Irani and Mr. Dasondi did very little to resolve this case in spite of the fact that I
9 often urged them to do so. At one point, in 2008, Boman was given a stay without even having
10 to argue. Defendants Mr. Dasondi and S. Irani failed to show up in court. When they did start
11 work on this case it was to release S. Irani's passport. They gave me nothing but grief about
12 getting my passport released, and the delay prevented me from leaving the country to help my
13 family when they needed me.

14 Regarding the case, during High Court proceedings Judge Nirgude said:

15"A person does not go into a fight with swords and tavlas, they take a gun"

16 I was unarmed and non-aggressive. Because of this counter suit, my passport was held by order
17 of the Borivali Court at M.H.B. Police Department until I came back to Seattle to visit my
18 Grandmother, whose health is in peril. I have kept the Borivali Magistrate Court informed of
19 my whereabouts and my intention to stay present in this case as well as the difficulties that I
20 am faced with by my wife.

21 I now believe that the reason defendant Dasondi and my wife, defendant S. Irani, were so
22 desperate to get me to go to Denver, was that they wanted to settle this case and take all of the

1 money from it. I don't believe that they thought they could do that with me present in India.

2 Of course my head injury would be my wife's damage claim; there has been a pattern of this

3 type of exploitation.

4 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS. THEFT OF WAGE. FORCED SERVITUDE**
5 **AND PEONAGE. BLACKMAIL 18 USC 873, FORCED LABOR 18 USC 1589.**

6 During our entire 14 year relationship most of my earnings have gone into her bank account,

7 when we lived in Seattle I worked for defendant, P. Irani, my wife S. Irani's brother, at

8 Reclaimed Antiques and Collectables. I worked there five days a week for four hours a day

9 while holding down another job. I was never paid anything for this work. I had to do this under

10 the threat of just what I am facing now. I was told that I had to do this work to pay for my

11 wife's divorce from her first husband. When we lived in Oklahoma City the house we lived in

12 was in her name, I just paid half of the mortgage and remodeled the house. It was sold and the

13 money was given to her eldest brother Tempton Irani. Tempton gave the money to a conman

14 by the name of Joseph Rodregez for a fictitious lone that was going to save the Yezdi

15 Motorcycle Co. I never saw a cent of the profits made on the sale of the house.

16 Defendant Dasondi has been given an office and much more money than I was ever allowed to

17 have every month during my entire time in India. He even depended on us for the use of our

18 computer when he first started working for us. It seems, however, that he became more reliant

19 on defendant P. Irani, who always comes in as the highest bidder.

20 Defendant S. Irani and defendant Dasondi have been trying to get me extradited. They have

21 lied to the court about my intention to return to India before I left and about my grandmothers

22 condition etc. My intention was always to return to India and it is not true that I came here

1 under the guise of my grandmother's illness, as has been asserted by Defendant Dasondi. I
2 have been trying to deal with all of this from here in Seattle.
3 On June 13, 2010 defendant S. Irani wrote, in an e-mail:
4" you can go to Denver put some offers there, we will manage the courts and other problems.
5 You can keep the condo ready and stay there".... See Exhibit R1 page 92.
6 On June 17, 2010, after I refused to go to Denver I received an e-mail that said:
7 "So are you coming on 21 July or are you jumping bail. because I have to inform". See Exhibit
8 R2 page 93.
9 On June 18, 2010 I wrote back saying in the first line:
10"I need to honor my obligation to the courts".... See Exhibit R3 page 93.
11 On June 15, 2010 I received this e-mail:
12"You succeeded in keeping me in the dark from what you had been planning
13 all of the time".... See Exhibit R4 page 93-94.
14 The true facts are these; My intention was always to return to India in late July and I had a
15 round trip ticket to do so. Regarding my grandmother's condition: On Feb. 28, 2010, my
16 grandmother fell and suffered the loss of half of her blood. She was hospitalized and
17 underwent two surgical procedures in attempts to stop the bleeding.
18 She now has brain damage and as a result of all of this, she now weighs about fifty pounds less
19 then when I had last seen her. I am actually grieving the loss of my grandmother as I knew her
20 and I am trying to help the grandmother that I now have. She is more frail than I thought she
21 would be. I can't help thinking that if I could have come sooner I could have helped prevent
22 this. She had actually been begging me to come home for a long time. Things happened that I

1 could have addressed, prevented, alleviated, etc. but I actually had no right to my family
2 according to the Iranis.

3 In fact my wife, defendant S. Irani and defendant Dasondi have never even enquired about my
4 grandmother's welfare, her condition or her prognosis. All that they were informed enough to
5 say is that they didn't know.

6 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS. INJURYOUS FALSEHOODS. CRIMINAL
ACTS CAUSING WRONGFUL PROSECUTION.**

7 What they have said, to the courts, to get me extradited is blatant perjury. Moreover we have
8 no idea how many other agencies they have spread these lies to.

9 It is not out of character for me to want to help the elders in my life, as I said before; I took care
10 of my father in law, in India, in 2003 to 2006. See Exhibit Q1 page 89.

11"under ostensible guise of visiting your ailing grandmother you left for U.S."....

12 Taking care of my wife's mother, Treaty Irani, was another task delegated to me. My wife was
13 too busy with law school and law suits. So taking the children to see their grandmother was my
14 responsibility, most of the time. I was often sent for the purpose of getting my mother in law
15 her monthly income, doing her shopping or driving her places etc.

16 I also helped defendant Dasondi's father rebuild a collapsed wall of his house.

17 Now I need to help my family here in Seattle. Defendant Dasondi and defendant S. Irani have
18 made this as difficult as they possibly could.

19 My mother is sixty six years old. She has been living here in my grandmother's home. She
20 helped keep my grandmother living independently, taking long walks daily, doing her own
21 banking and shopping until she was in the last part of her 87th year. When my grandmother

1 was put into the recovery center, where she now resides, my mother was asked to pay the
2 expenses related to this house. She has no income, so I am here paying the taxes, utilities,
3 insurance and house payment. If I had not arrived when I did, the utilities would have been
4 turned off and this house would have been in foreclosure. I have asked my wife, defendant S.
5 Irani, to join me here with our children. The house we live in is a duplex so there is room for
6 everyone.

7 The defendant, P. Irani tried to assume ownership of our property, in India, by acting as if he
8 was our boss. Defendant P. Irani was hyper critical and hyper instructive and he did not
9 hesitate to throw out false accusations to try to intimidate. For evidence supporting these
10 claims See June 19, 2007 e-mail. Exhibit G5, page 20. These seem to be tactics that they have
11 been using for a long time. See Exhibit W p. 145-146. Ex. U p. 120, 122.

12 In a message posted to me on Facebook Mr. John Haubrich, defendant S. Irani's former
13 husband had this to say about the defendant P. Irani and his sister, defendant S. Irani.

14" I did not kick her out, she and Porus had a plot to blackmail me, accuse me of the abuse
15 Martin placed upon her (what a wonderful loving brother)".... Exhibit V, page 134-135.

16 Defendant P. Irani has defrauded my family and I from exclusive ownership while taking
17 majority ownership and he forces my wife, defendant S. Irani, to take full responsibility for all
18 matters regarding anything that happens to the properties at any time. Effectively, my wife, is
19 fully responsible to maintain and defend what he considers his property, to enforce his alleged
20 extortion and to handle any other legal matter of any kind that may arise, anywhere. It is no
21 coincidence that, until one month before my wife graduated from ILS law school, I had not been

1 out of India even for a visit since March of 2007. My children had never been allowed out of
2 India since their arrival in March of 2003.

3 **WILLFULL AND INTENTIONAL INTERFERANCE WITH CHILD CUSTODY, INTENTIONAL**
4 **INTERFERANCE WITH PARENTAL RELATIONS. INTENTIONAL INTERFERANCE WITH MARITAL**
5 **RELATIONS. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS. HONEST SERVICES FRAUD**
6 **18 USC 1346.**

7 I prepared a document on my computer before I left India. Although I assumed an attorney
8 client privilege, defendant Dasondi gave a copy of this document to defendants S. Irani and P.
9 Irani, without my permission.

10 Exhibit U page 112-133. See page 119 and 122. (Porus Irani e-mails. May 24, 2004)

11 Months after I left India, the children were moved from our two bedroom home, in a gated
12 community, on grounds with a swimming pool. This is where all of our children's friends lived
13 and where our children had been enrolled in school. This was a safe place for the children to
14 play. However, because my wife does not like to take care of children, the children were
15 moved from Pune to Bandra, Mumbai at 27 Ladhani House, Professor Almeida Road, Bandra
16 (W) Mumbai, 400050, Maharashtra India. Here they are taken care of by their grandmother
17 because the defendant, S. Irani does not like her time or movement restricted by the
18 responsibilities of motherhood. This is where my daughter, Aanahita is being sequestered.

19 Bandra Mumbai is a seedy place and Ladhani House is a dangerous place without security.

20 **THE SAME ILLEGAL TACTICS USED IN INDIA ARE USED IN CALIFORNIA. WILLFUL AND**
21 **INTENTIONAL FALSE PROSECUTION OF PLAINTIFF IN STATE OF CALIFORNIA. WILLFUL AND**
22 **INTENTIONAL DECEPTION OF THE CALIFORNIA FAMILY COURTS. MAILING THREATENING**
30 **COMMUNICATIONS 18 USC 876, FRAUD AND FALSE STATEMENTS 18 USC 1028, 1028 (A),**
31 **HOSTAGE TAKING 18 USC § 1203, EQUAL RIGHTS UNDER THE LAW 42 USC 1981, CONSPIRACY**
32 **TO INTERFERE WITH CIVIL RIGHTS 42 USC 1985.**

1 In February, 2012 my wife went to Los Angeles, to establish residency, in order to file for
2 divorce and take the bar exam. She has applied for MediCal and perhaps other services, for
3 the children, as if they were there with her. In fact I spoke to my daughter in India in Feb, Mar,
4 April and May of 2012. I was unable to speak to my son, because my daughter kept telling me
5 that he was out. My wife has returned to India and I have reason to suspect that my son is now
6 living here in the U.S., in California with defendant P. Irani. According to the fourth facebook
7 page for, my son, M. Irani, he is attending Reseda High School in Los Angeles CA. See Exhibit S
8 page 95 and Exhibit V page 134-144.

9 My daughter is currently living with her grandmother in Bandra Mumbai India while, I suspect
10 her mother holds residence elsewhere or may be in jail in India. I fear that my daughter is being
11 used to take care of her grandmother and that my son is being exploited in Los Angeles the
12 same way that I was always exploited. Defendant P. Irani seems to view my children and I as
13 servants and I believe that there is a racial component here that is very damaging to my
14 children. I also fear that these children will be corrupted, the way I believe that, my stepson,
15 defendant J. Haubrich has been corrupted. The defendant, S. Irani, has never taken care of
16 these children. Her conduct shows the extent to which she is willing to go to possess them but
17 not care of them. She has defined me as a deadbeat dad, a violent husband and parent. There
18 is no record of any such thing.

19 Based upon my response to the state of California, a letter was sent to defendant S. Irani
20 requesting further information, and she declined to reply. So after a six month effort to obtain
21 child support and MediCal, which was simultaneously supported by a campaign of intimidation
22 and harassment involving defendant S. Irani and defendant Dasondi, urging me to just pay! My

1 wife returned to India. I have since learned that my son is now living with his uncle, defendant
2 P. Irani, in Los Angeles, who knows that I have been fighting for custody of my children. For
3 evidence of this campaign of harassment that includes an anonymous letter from California,
4 allegedly from defendant S. Irani threatening extradition, and a demanding, threatening and
5 intimidating e-mail from defendant Dasondi, along with several from S. Irani.

6 See Exhibits S p. 96-101.

7 After spending six months preparing a divorce petition here in Seattle, I have consulted
8 attorneys that tell me that Washington State has no jurisdiction over my children. I have spent
9 the last 2 years responding to a guardian petition in India, The state of California was willing to
10 refuse to give me the whereabouts of my family based upon the lies that defendant S. Irani told
11 them.

12 To support the allegation that I did not work while I was in India, they have stated that I have
13 not worked throughout my relationship with defendant S. Irani. My Social Security work
14 records prove that I have worked since I was a teenager and throughout my relationship to S.
15 Irani. See Exhibits T Pages 102-111.

16 In 2002 I submitted a petition in support of proposed temporary parenting plan for the superior
17 court of Washington, King County. In it I stated that I feared that my children would be taken
18 away to India. I did this because my children were constantly being sent abroad and because I
19 did not want to move too India. My wife convinced me we needed to do this for our kids, our
20 family. See Exhibit W p. 145-146.

21 **WILLFULL AND INTENTIONAL INTERFERANCE WITH CHILD CUSTODY, INTENTIONAL**
22 **INTERFERANCE WITH PARENTAL RELATIONS. INTENTIONAL INTERFERANCE WITH MARITAL**
RELATIONS. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS. HOSTAGE TAKING 18 USC

1 **1208, MAIL FRAUD; FRAUDS AND SWINDLES 18 USC 1341, FRAUD BY WIRE, RADIO OR**
 2 **TELEVISION 18 USC 1343, RETALIATING AGAINST VICTIM 18 USC 1513, PEONAGE:**
 3 **OBSTRUCTING ENFORCEMENT 18 USC 1581, FORCED LABOR 18 USC 1589, DIVERSITY OF**
 4 **CITIZENSHIP AMOUNT IN CONTROVERSY 28 USC 1332, EQUAL RIGHTS UNDER THE LAW 42**
 5 **USC 1981, CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS 42 USC 1985.**

6 If defendant, P. Irani, wants children, he should have his own. He cannot, however, assume to
 7 be the parent of my children. If defendant P. Irani wanted this restaurant, he should have been
 8 successful on one of the many occasions that he tried to convince his father to give it to him
 9 and he should put in the time and work that we have invested.

10 We reserve the right to produce other e-mail evidence.

11 **Relief**

12 1. Compensation for malicious Copyright and Lanham Act infringement and the sabotage
 13 of our project to form a coalition for non-bigotry. This was allegedly initiated in retaliation for a
 14 letter written by attorney Bradley Marshal to defend ant P. Irani. Restraining orders
 15 preventing all accused parties from any further harassment.

16 2. I want my son who is living in Reseda, CA. with my brother in law, defendant P. Irani. He
 17 is living there under the name Irani. For the last six months his mother has been living in India.
 18 This is happening without my consent and against my wishes. I want my son returned to me.

19 3. I want my Daughter, who is, allegedly, living with her grandmother, Treaty Adi Irani,
 20 without her mother's presence. I have been told that Defendant S. Irani has been living
 21 separately from my daughter in Mumbai and only visits on the weekend.

1 4. Attorney's fees for the pending case in Puna Family Court, which was allegedly initiated
2 in retaliation for a letter written by attorney Bradley Marshal to defendant Porus Irani.

3 Attorney's fees for this law suit.

4 5. Attorney's fees for the case in Borivli Metropolitan Magistrate court in India, because of
5 the alleged malpractice engaged in by defendant Ms. Haubrich and our attorney Mr. Himanshu
6 Dasondi, allegedly initiated in retaliation for a letter written by attorney Bradley Marshal to
7 defendant P. Irani.

8 6. Punitive damages for the mental anguish and emotional distress of the children of
9 defendant S. Irani and plaintiff L.R.D. Ervin, (minor children), Virginia K. Palmer and myself,
10 Louis Robert Dean Ervin.

11 7. 70% of Adi Irani's Blue Gardenia Restaurant Bar and Bakery.

12 8. All charges of the criminal complaint, in Borivali Magistrate Court, in India, dropped and
13 damages for physical and emotional harm incurred in the assault at Ideal Farm, Dahisar Farm,
14 Mumbai 400068 by Mr. Boman R. Irani, his security and his associates at Rustomjee Builders.

15 9. When I met defendant S. Irani I was in school. Now, after a fifteen year diversion, I want
16 to go back to school.

17 10. I want the 15 crore Rs. Offered as settlement of the criminal case, by Mr. Boman Irani,
18 equivalent to \$ 3,255,000.00. Three million two hundred and fifty five thousand dollars.

19 11. Any other relief that the court deems appropriate.

20 Date: 8/5/13

Signature of Plaintiff or Attorney: Louis R D Ervin

21 Date: 8/5/13

Signature of Plaintiff or Attorney: Virginia K. Palmer

22 34 -CIVIL COMPLAINT

Louis R. D. Ervin
4016 Letitia Ave S.
Seattle, Washington
98118
(206)913-8194